



May 19, 2023

VIA ECF

Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
300 Quarropas Street, Courtroom 521
White Plains, New York 10601

**Re: *Finn v. Empress Ambulance Services, Inc. d/b/a Empress EMS*,
Case No. 7:22-cv-08101-KMK (the “Finn Action”)**

Dear Judge Karas:

As you know, we represent Plaintiff Finn in the above-captioned *Finn* Action. Plaintiff writes jointly with Empress Ambulance Service, LLC (“Empress”) pursuant to the Court’s November 14, 2022 Order (ECF No. 17) requiring the parties to the *Finn* action to submit joint status reports to the public docket providing updates on the progress of settlement negotiations every 14 days. The fourteenth status report is due today, May 19, 2023.

Since the parties’ previous status report, they have been hard at work on the motion for preliminary approval and supporting settlement documents. As previously noted, the parties also have agreed to a plan to avoid jurisdictional objections. The parties will continue to work with the settlement administrator and notice expert to draft the long and short form notice, claim form, settlement website content, and telephonic procedures. Plaintiffs intend to file the motion for preliminary approval ahead of the next status report, which is due on June 2.

Therefore, we respectfully request that the Court continue to stay the later-filed actions during this process. In accordance with the Court’s November 14, 2022 Order, will provide another status update on June 2, 2023.

Sincerely,

AHDOOT & WOLFSON, PC

A handwritten signature in blue ink, appearing to read "T. Wolfson".

Tina Wolfson

cc: All counsel of record (via ECF)